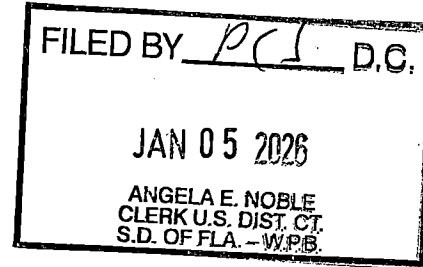


January 2, 2026

Honorable William P. Dimitrouleas  
United States District Court  
Southern District of Florida



Re: Cruz Valdivieso Figuera v. All VIP Care, Inc.  
Case No: 0:22-CV61553-DIMITROULEAS/HUNT

**MOTION TO DISSOLVE WRIT OF GARNISHMENT**

Dear Honorable Judge Dimitrouleas,

I am the Defendant in the above-captioned case. I write to respectfully request the court to dissolve Mr. Pollack Writ of Garnishment since the judgement has been satisfied in the amount of \$25,045.91.

For the record since it appears that my former disbarred attorney Hurckes failed to work on the matter, I would like to point out the following:

Mr. Pollack has received funds as outlined below proves that the order entered by the court to pay Mr. Pollack was not ignored.

September 2024 - \$100,000

December 2024 - \$25,000

**January 2025 - \$25,000 (Mr. Pollack while admitting he received the check refused to cash the check)**

This is a total of \$150,000.

Check number 3397 sent on January 17, 2025, in the amount of \$25,000 that indicated FINAL PAYMENT on the "for section of the check," was not cashed. Mr. Pollack did not cash the check to my knowledge, because he was requesting more money. Mr. Pollack is stating he was not paid and stating to the court he was working on this matter; however, he

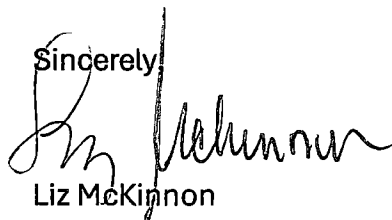
was paid in September 2024, December 2024 and January 2025. What is there to work on? I do not understand the need to overbill, and I object to him requesting thousands of dollars in addition to the \$150,000. Justice is about completing someone, not putting them ahead.

Your honor, it has been an entire year, and I am asking the court to please put an end to this case since I have satisfied with the judgment.

Your honor, Mr. Pollack has no need to file a Writ of Garnishment because All VIP Care, Inc. will continue to obey the court's order(s). Moreover, Pollack filing a Motion of Writ of Garnishment on or about September 2025 while having the final check in his possession is wrong. There is no need to garnish All VIP Care business accounts which affect others in the community.

I have attached evidence that the payment was sent to Mr. Pollack on Wednesday, December 31, 2025, to his Wells Fargo Bank, N.A. account.

Thank you.

Sincerely,  
  
Liz McKinnon

All VIP Care, Inc.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the Plaintiff's attorney, Brian H. Pollock at [brian@fairlawattorney.com](mailto:brian@fairlawattorney.com).




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**Re: Cruz Valdivieso Figuera v. All VIP Care, Inc. & Liz Vanessa McKinnon Case No: 0:22-CV61553-DIMITROULEAS/HUNT**

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**From** Liz McKinnon <liz@allvipcare.com>  
**Date** Thu 10/2/2025 10:44 AM  
**To** Dimitrouleas@flsd.uscourts.gov <Dimitrouleas@flsd.uscourts.gov>  
**Cc** brian@fairlawattorney.com <brian@fairlawattorney.com>

 1 attachment (12 MB)  
hurckes10.2.25.pdf;

Good Morning,

Regardless, that I have sent Mr. Pollack \$150,000, he has motioned the court to garnish my business account. Mr. Pollack continues to seek more money and more money.

My current attorney seems to be in JAIL. I have not heard from him or his office. Therefore, I am asking the Honorable Judge Dimitrouleas to be fair and not to interpret this communication as improper. I am also asking the Judge to vacate the garnishment that is not necessary and affecting my business. Afterall, justice is about completing someone and not putting them ahead.

Meanwhile, I will be diligent in seeking new counsel. I hope to find one with dignity and professionalism soon.

Thank you.



**Liz Vanessa McKinnon, MBA**  
**Administrator, Community Liaison**  
**All VIP Care & Staffing, Inc.**  
**5601 Corporate Way, Ste 204**  
**W. Palm Beach, FL 33407**  
**561/294-5374 (Cell)**  
**561/268-2531 (Office)**

**561/228-0729 (eFax)**

**Pahokee/Belle Glade Satellite Office**  
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**1664 SW Bayshore Blvd**  
**Port St. Lucie, Florida 34984**  
**772/ 236-7520 (Office)**  
**561/228-0729 (eFax)**

**Broward Location**  
**10 Fairway Drive, Ste 100 F**  
**Deerfield Beach, FL 33441**  
**954/884-5505 (Office)**  
**954/206-0444 (eFax)**

**Miami Location**  
**1380 NE Miami Gardens Dr., Ste 271**  
**N Miami Gardens, FL 33179**  
**786/765-1614 (Office)**  
**305/675-2639 (Fax)**

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Outlook

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**RE: Today's wire**

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**From** Emily Duck <Emily\_Duck@appliedbank.com>

**Date** Wed 12/31/2025 1:02 PM

**To** Liz McKinnon <liz@allvipcare.com>

Hi Liz,

I pasted the confirmations for each wire below.

IMAD: \$ 69,814.75 - 20251231QMGFT003000430

IMAD: \$ 25,045.19 - 20251231QMGFT012000500

Thank you!

**Emily Duck**

Applied Bank

Head Teller

Phone: 302-227-3044

Email: [emily\\_duck@appliedbank.com](mailto:emily_duck@appliedbank.com)

37012 Country Club Road

Rehoboth Beach, DE 19971



Protect Your Deposits with the Safest Bank in the Country

Wire payment to  
Brian Pollack

---

**From:** Liz McKinnon <liz@allvipcare.com>

**Sent:** Wednesday, December 31, 2025 12:26 PM

**To:** Emily Duck <Emily\_Duck@appliedbank.com>

**Subject:** Today's wire

**Caution. External Email. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hello,

I need the confirmation for the wire in the amount of \$25,045.19 that was issued today.

Thank you.

# FairLaw Firm

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135 San Lorenzo Avenue, Suite 770  
Coral Gables, Florida 33146

TEL 305.230.4884 FAX 305.230.4844

*brian@fairlawattorney.com www.fairlawattorney.com*

## **FAIRLAW FIRM OPERATING ACCOUNT WIRE INFO**

Wire into:

WellsFargo Bank, N.A.

Title: FairLaw Firm

ABA No. : 121000248

Account No.: 2000022343471

SWIFT: WFBIUS6S

3395

DATE 1/19/2020

TO Expert

FOR Handyman

TAX DEDUCTIBLE ☐

TOTAL

THIS CHECK

OTHER TRANS. +/-

BALANCE

BAL. BRO'T FOR'D

DEPOSITS 2000

3396

DATE 1/20/25

TO Travis

FOR

TAX DEDUCTIBLE ☐

TOTAL

THIS CHECK

OTHER TRANS. +/-

BALANCE

DEPOSITS 400

3397

DATE 1/17/25

TO Brian

FOR Palmer

TAX DEDUCTIBLE ☐

TOTAL

THIS CHECK

OTHER TRANS. +/-

BALANCE

DEPOSITS 25000

Final Payment

*[Handwritten mark]*



Account Activity

Thursday, October 09, 2025

Business Checking Plus XXXXXX6283

Available Balance: -\$43,055.98

- due to the garnishment

Pending Transactions

These transactions have been submitted to us since the last business day and are not yet posted to your account. When they have posted, they will be reflected in your Posted Transactions. Pending items may affect your Available Balance and are not a statement of your account.

Date	Description	Withdrawals	Deposits
10/09/2025	ACH DEBIT SAMCO PROPERTIES	\$887.25	

Posted Transactions

Date	Description	Withdrawals	Deposits	Balance
09/30/2024	CASHIERS CHECK LEGAL	\$100,000.00		\$31,804.40
12/16/2023	ONLINE TRANSFER TO XXXXX0106	\$100,000.00		\$1,311,804.40
12/11/2023	DOMESTIC INCOMING WIRE 23CBM123HB7E0UWC		\$100,000.00	\$2,311,804.40

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Need Help? Call us at 1-888-PNC-BANK (762-2265)

\$100,000 payment



Date	Description	Amount	Account
12/06/2024	Check 3358	\$25,000.00	XXXXXX6283

This is an image of a check, substitute check, or deposit ticket. Refer to your posted transactions to verify the status of the item. For more information about image delivery [click here](#) or to speak with a representative call: 1-888-PNC-BANK (1-888-762-2265) Monday - Friday: 8 a.m. - 9 p.m. ET, Saturday & Sunday: 8 a.m. - 5 p.m. ET.

ALL VIP CARE INC  
5501 CORPORATE WAY #204  
WEST PALM BEACH, FL 33407

3358  
63-04137573  
740

DATE 12/4/2024

PAY TO THE ORDER OF Brian Pollock, Esq.  
Twenty five Thousand 00/100 \$ 25,000.00  
DOLLARS

PNC BANK  
PNC Bank, N.A. 001

FOR

003358 267084199 1238248283

267084199  
1238246283  
ALL VIP CARE INC

**Security Features exceed industry standards and include:**

- **ImageMatch™** Matching account and check number on back; Print No 5 240 (08)
- **MobileMark™** Mobile Deposit check mark to indicate, check has been deposited via mobile device
- **The Security Weave™** pattern on back designed to deter fraud
- **Microprint IAP** lines printed on front and back
- **The words "ORIGINAL DOCUMENT"** across the back
- **Photo Safe Deposit™** icon visible on front and back

**Do not cash it.**

- Any of the features listed above are missing or appear altered
- Fugitive Ink on back looks pink or has disappeared
- Brown stains or colored spots appear on both front and back, and in Chemical Wash Detection Box



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**Liz Vanessa McKinnon, MBA  
Administrator, Community Liaison  
All VIP Care & Staffing, Inc.  
5601 Corporate Way, Ste 204  
W. Palm Beach, FL 33407**

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**Re: Law Firm Reminder 537, 540, 541, 554, 555, 557, 558, 571, and 585**

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**From** Liz McKinnon <liz@allvipcare.com>  
**Date** Mon 1/13/2025 1:27 PM  
**To** Elizabeth Perez <elizabeth@plglawoffice.com>

Hello,

I will be making a payment next week since I should be done with reviewing and gathering all the invoices that pertain to the two retainers.

I just put the last check for Pollack in the mail in the amount of \$25,000. This is done.

Thank you.



**Liz Vanessa McKinnon, MBA**  
**Administrator, Community Liaison**  
**All VIP Care & Staffing, Inc.**  
**5601 Corporate Way, Ste 204**  
**W. Palm Beach, FL 33407**  
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